

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Richmond Division

EUGENE GADSON,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:16CV882
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
_____)	

JOINT STIPULATIONS

Plaintiff Eugene Gadson and Defendant United States of America jointly submit the following stipulations:

1. The jurisdiction and venue in this matter are proper.
2. Plaintiff asserts a negligence claim against the United States of America regarding a vasovasostomy (“vasectomy reversal” or “the surgery”) Plaintiff underwent at the Hunter Holmes McGuire Veterans Affairs Medical Center (“VAMC”) in Richmond, Virginia.
3. Plaintiff underwent a vasectomy in 2009.
4. Jay E. Sulek, MD (“Dr. Sulek”) was an employee/agent of the VAMC during calendar year 2015.
5. Adam P. Klausner, MD (“Dr. Klausner”) was an employee/agent of the VAMC during calendar year 2015.
6. Shaoqing Zhou, MD (“Dr. Zhou”) was an employee/agent of the VAMC during calendar year 2015.
7. Evelyn Johnson (“Ms. Johnson”) was an employee/agent of the VAMC during calendar year 2015.

8. Jacqueline French, RN (“Ms. French”) was an employee/agent of the VAMC during calendar year 2015.

9. On May 1, 2015, Plaintiff had an initial consult with Dr. Joseph Habibi at the VAMC.

10. During the May 1, 2015 consult, Plaintiff elected to move forward with the surgery.

11. On August 6, 2015, Plaintiff underwent a pre-operative exam with Dr. Randy Vince at the VAMC.

12. The surgery occurred on August 20, 2015.

13. The surgery was performed by attending surgeon Dr. Adam Klausner and chief resident Dr. Shaoqing Zhou – both of the VAMC.

14. On August 23, 2015, Plaintiff underwent a surgery called an orchiectomy to remove his left testicle at Henrico Doctors Hospital.

15. The orchiectomy was performed by Dr. David Rapp.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

L. Margaret Harker
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/s/

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